

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

2015 Annual 64.2009(e) CPNI Certification covering the prior calendar year 2014

Name of company covered by this certification: The Great American Enterprise, Inc. d/b/a  
MPW Paging

Form 499 Filer ID: 811850

Name of signatory: Richard T. Jones

Title of signatory: President

I, Richard T. Jones, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that, to the best of my knowledge, information and belief, are adequate to ensure compliance with the Commission's CPNI rules as I understand them.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

The company has reviewed and modified its CPNI policies and practices as deemed necessary in order to comply with the CPNI rule changes adopted by the FCC in 2007.

The company has not taken any actions against data brokers (*i.e.*, instituted proceedings or filed petitions at either state commissions, the court system, or at the FCC) during 2014.

The company has not had any pretexters attempting to gain access to CPNI during 2014.

The company has not received any customer complaints during 2014 concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17, which requires truthful and accurate statements to the FCC. The company also acknowledges that false statements and misrepresentations to the FCC are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
Richard T. Jones

Date: 2/19/2015

### CUSTOMER PROPRIETARY NETWORK INFORMATION COMPANY POLICY

CPNI as defined by the Federal Communications Commission means "Customer Proprietary Network Information" and for the sake of this policy shall include any information we have about our customer, the customer's system, the customer's use of our system or any other information we have about that customer.

It shall be the policy of this company to have a zero tolerance toward the use of customer proprietary network information (CPNI) for any reason other than our routine company business.

We shall be very aware of "pretexting", the practice of pretending to be a customer or other authorized person in order to obtain access to that customer's call detail, or other private information contained in our records.

To facilitate this CPNI policy we shall do the following:

No information shall be kept on any computer system that is accessible from the outside world.

No written documents shall be considered trash until that document is shredded.

No customer information shall be transmitted to anyone outside this business in spoken word, written word, or by any other electronic or non-electronic means until you have verified who that person is. This authentication shall be carried out by having a pre-established password, or by sending the information to a known person at the customer's address of record, or by calling the customer's known telephone number of record and speaking to a known person of contact. Any new person of contact must be introduced by the previous known person of contact.

Any online access or dial-up access must be password protected. That password can only be given to the customer's representative in person and must be a randomly selected password.

Any media that has contained customer information shall be destroyed before it is discarded.

Anyone that suspects CPNI has been transmitted in violation of these rules is to report the violation to his/her supervisor immediately or directly to the company manager or president.

Any breach of CPNI information shall be reported to local law enforcement and by sending electronic notification through a central reporting facility to the United States Secret Service and the Federal Bureau of Investigation within seven days or sooner.

Anyone violating these rules shall be subject to immediate termination. Violating this policy is not acceptable in any form.